

# Allegheny County Health Department

## COUNTY COMMISSIONERS

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301 39th St.  
Pittsburgh, PA 15201-1891

July 31, 1997

Bruce W. Dixon, M.D.  
Director

Roger C. Westman, Ph.D.  
Air Quality Manager

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Thomas Goettge, Plant Manager  
USS Clairton Works  
USX Corporation  
400 State Street  
Clairton, PA 15025

RECEIVED

AUG 12 A.M.

AIR ENFORCEMENT BRANCH  
PA Dept of Env  
11

RE: Settlement Offer; Statement of Violations No. 970701;  
USS Clairton Works; January - March 1997

Dear Mr. Goettge:

A Statement of Violations with regard to the USX Corporation USS Division Clairton Works, 400 State St., Clairton, 15025 (USX), has been turned over to my office for appropriate enforcement action. Specifically this letter addresses the alleged violations, observed by County Inspectors and from USX reports, of various provisions of Articles XXI, Rules and Regulations of the Allegheny County Health Department, Air Pollution Control ("Article XXI"), at your company's Clairton Works during the first quarter January 1, 1997, through March 31, 1997.

This letter also constitutes an offer to settle these alleged violations, without the cost and burden of litigation, by payment of a civil penalty to the County in the amount of \$7,300 by no later than 30 days from the date of this letter.

These alleged air pollution control violations at your Allegheny County Clairton Works, including Batteries 1, 2, 3, 7, 8, 9, 13, 14, 15, 19, 20, and B, involve the following:

- Excessive visible emissions from the charging of Battery 8 in violation of §2105.21.b of Article XXI; and

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USX Corporation  
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- Excessive visible emissions from the pushing of coke from Batteries 3, 13, 15, 19, 20, and B in violation of §2105.21.e.4 of Article XXI; and
- Excessive visible emissions from the transport of coke from Battery 13 in violation of §2105.21.e.5 of Article XXI; and
- Excessive visible emissions from the coke oven combustion stacks at Batteries 7, 9, 19, and B in violation of §2105.21.f.3 of Article XXI.

Summaries of the alleged violations and the basis for this settlement offer are enclosed with this letter. If USX chooses to accept this offer, a civil penalty payment in the amount of \$7,300, by check payable to the "Allegheny County Clean Air Fund", must be received by this office, to my attention at the address above, by no later than the deadline indicated above. If such penalty payment is made in accordance with this offer, the County, by this letter, hereby agrees to accept such penalty in full satisfaction of all violations alleged herein, without any final determination of law or fact, and hereby agrees to not seek any further penalties or remedial actions for such alleged violations.

The County prefers to settle alleged violations such as these rather than initiating litigation. A failure to accept this settlement offer by the deadline stated, however, will result in formal enforcement action by the County, which could include the filing of summary criminal complaints before the designated district justice.

In addition, the settlement terms acceptable to the County will increase after such deadline since additional enforcement resources will be committed to this matter.

The amount of the civil penalty payment from your company which has been offered to settle these violations in the above-referenced areas is based on the nature, severity, and frequency of the alleged violations, on the potential summary criminal penalties, upon conviction, of \$100 to \$2,500 per violation per day, and on the potential civil penalties of up to \$25,000 per violation per day. Also considered are such things as the health effects of the pollutants involved, the apparent willful or

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inadvertent nature of the violations, any potential impacts on the public, any actions taken, or being taken by your company (that have been reported to the County) to minimize the violations or to prevent future violations, the level of success of such actions, and the compliance history of the source.

Thank you for your anticipated prompt attention to this matter.

Very truly yours,



Roger C. Westman, Ph.D.  
Air Quality Manager

encl.

cc: Bruce W. Dixon, M.D.	(w/ encl.)
Stephen K. Todd	(" " )
USX Corp.	
Richard Dworek	(" " )
USX Corp.	
H. R. McCollum	(" " )
USX Corp.	
Joseph Pezze	(" " )
PA DEP, Pgh.	
Thomas J. Maslany	(" " )
US EPA Reg. III, Phil.	
William U. Clark	(" " )
Henry Miller III	(w/o encl.)

ALLEGHENY COUNTY HEALTH DEPARTMENT  
AIR QUALITY PROGRAM  
USX CORPORATION - USS CLAIRTON WORKS  
Coke Plant Performance Data

1st Quarter (January, February, March) 1997

SUMMARY

<u>Source</u>	<u>Violations</u>			<u>Civil Penalty</u>	
	<u>(except</u> <u>as noted)</u>	<u>non-de minimis</u>		<u>Settlement</u>	<u>Offer</u>
Visible Emissions					
Charging	2	2	x	\$350.00	= \$ 700.00
Door Areas	0	0			
Charging Ports	0	0			
Offtake Piping	0	0			
Pushing					
with control device 20% Opacity Std.	10	10	x	\$450.00	= \$4,500.00
transport w/o control 10% Opacity Std.	1	1	x	\$300.00	= \$ 300.00
Combustion Stacks					
20% Opacity Std.	4	4	x	\$450.00	= \$1,800.00
60% Opacity Std.	0	0			
Pushing Control Unavailability 1.46%		0 (a)			
Coke Oven Gas Desulfurization					
Performance	2	0			
Unavailability (b)	13.7%				
Breakdown Reporting	0	0			
Flaring of Raw Coke Oven Gas	2 (c,d)	0			
Venting of Raw Coke Oven Gas	1 (c,d)	0			
Monthly & Monitoring Reports (timeliness, completeness, etc.)	0	0			
Total	22+	17			

\$7,300.00

- (a) Based on individual battery unit monthly performance.  
(b) Unavailability of part of the desulfurization unit may not cause an exceedance of the standard; desulfurization was in compliance 97.8% of the time (88 of 90 days) during the first quarter 1997.  
(c) Number of battery 15-minute periods, or part thereof.  
(d) Flaring: 14 battery-minutes; venting (unflared): 4 battery-minutes.

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1st Quarter (January, February, March) 1997

<u>SOURCE</u>	<u>BATTERY</u>	<u>DATE</u>	<u>OBSERVATIONS</u>
<u>Visible Emissions</u>			
Charging	08	02/03	163 secs.
	08	02/28	116
Door Areas	NO VIOLATIONS		
Charging Ports	NO VIOLATIONS		
Offtake Piping	NO VIOLATIONS		
Pushing			
w/control device	19	01/27	09 secs. $\geq 20\%$ ( 80% max.)
20% standard	20	01/27	15
	B	01/29	10
	03	02/11	10
	19	02/18	19
	20	02/18	24
	20	02/23	14
	13	03/10	18
	20	03/17	28
	15	03/27	28
			100
transport in	13	03/10	10
open atmosphere			35
10% standard			
<u>Combustion Stacks</u>			
20% standard	B	02/10	13.8 min. ( $\geq 20\%$ )
	19	02/19	17.3
	07	03/14	9.5
	09	03/31	4.8
60% standard	NO VIOLATIONS		

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Coke Plant Performance Data

1st Quarter (January, February, March) 1997

Pushing Control System Unavailability

<u>Battery No.</u>	<u>Uncontrolled Pushes</u>	
	<u>Month/Year</u>	<u>%</u>
1,2,3	01/97	0.09
	02/97	1.62
	03/97	3.14
7,8,9	01/97	0.72
	02/97	2.16
	03/97	2.00
13,14,15	01/97	1.28
	02/97	1.66
	03/97	1.67
19 & 20	01/97	3.19
	02/97	1.11
	03/97	0.83
B	01/97	0.00
	02/97	0.00
	03/97	0.00

Total Pushes ( 12 Batteries ): 92,872

Coke Oven Gas Desulfurization

	<u>Bat. No.</u>	<u>Date</u>
Performance	all	03/13,14
Unavailability	all	01/12,19-29 02/17-19 03/13,14

Total: 13 24-hr period(s), or  
part thereof, w/o full use of  
the desulfurization process.

Note: During the first quarter 1997, desulfurization was in compliance  
97.8% of the time on a daily basis (88 of 90 days). Unavailability  
of part of the desulfurization unit may not cause an exceedance of  
the standard.

Delayed Breakdown Reporting

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ALLEGHENY COUNTY HEALTH DEPARTMENT  
AIR QUALITY PROGRAM  
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1st Quarter (January, February, March) 1997

Venting/Flaring of Raw Coke Oven Gas

<u>Emission Incident (date)</u>	<u>Notes</u>	<u>Battery (No.)</u>	<u>Emission (start and end time)</u>	<u>Periods(a.) of Emission</u>	<u>Emission (vented or flared)</u>
02/22/97	(b.)	01	0300:00-0300:00	1 (30 sec.)	Flared
03/06/97		13	0831:00-0835:00	1 ( 4 min.)	Vented
03/16/97		09	0804:00-0817:00	1 (13 min.)	Flared

a. Number of battery-15-minute periods or part thereof, of emission(s).

b. Incidents (flaring only) less than 2 minutes duration not reported in real time, but summarized in Process Information Report submitted to ACHD-AQP by USS.

Monitoring/Monthly Reports

NO VIOLATIONS

ALLEGHENY COUNTY HEALTH DEPARTMENT  
 AIR QUALITY PROGRAM  
 Coke Plant Enforcement Data  
 USX CORPORATION - USS CLAIRTON WORKS

1st Quarter (January, February, March) 1997

<u>SOURCE</u>	<u>TOTAL INSPECTIONS</u>	<u>VIOLATIONS</u>	<u>COMPLIANCE</u>
CHARGING	59	2	96.6
DOOR AREAS	58	0	100%
CHARGING PORTS	63	0	100%
OFFTAKES	63	0	100%
PUSHING			
Pushing $\geq 20\%$	93	10	89.2
Travel $> 10\%$	93	1	98.9
STACKS			
$\geq 20\%$	78	4	94.9
$\geq 60\%$	78	0	100

05/12/97